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WC 05-206

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

MAY 24 2005

Federal Communications Commission
Office of Secretary

In the Matter of)
)
Section 63.71 Application of)
)
SBC Communications Inc.)
For Authority Pursuant to Section 214 of)
The Communications Act of 1934, As Amended,)
To Discontinue the Provision of Service)
File No.

SECTION 63.71 APPLICATION OF
SBC ADVANCED SOLUTIONS, INC.

SBC Advanced Solutions, Inc. ("SBC ASI") applies for authority under Section 214(a) of the Communications Act, as amended ("the Act"), 47 U.S.C. § 214 and Section 63.71 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. § 63.71, to discontinue Network Access Point ("NAP") service in Los Angeles and San Francisco California.

As required by Section 63.71(a) and (b) of the Commission's rules, SBC ASI is providing the following information:

Name and Address of Carrier (47 C.F.R. §§ 63.71(a)(1), (b)(2)):

SBC Advanced Solutions, Inc.
1010 N. St. Marys
Room 13M
San Antonio, TX 78215

Date of Planned Service Discontinuance (47 C.F.R. §§ 63.71(a)(2), (b)(2)): As soon as the FCC authorizes discontinuance of this service, SBC ASI will remove this service

from its statement of Terms and Conditions located at the following web address:

<http://www.sbc.com/gen/public-affairs?pid=1215>.

Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), (b)(2)):

Los Angeles and San Francisco, California

Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(3), (b)(2)):

The Network Access Point ("NAP") service uses ATM technology to allow Internet Service Providers ("ISPs"), government, research, and educational organizations to interconnect and exchange information. This exchange of Internet traffic is generally referred to as "peering". The West NAP is one of the four original National Science Foundation sponsored NAPS and was initially created to allow ISPs to interconnect and exchange Internet traffic amongst themselves (public peering) using ATM layer 2 technology.

Technology and Internet access architecture changes have rendered this service obsolete. After several years of declining demand, SBC ASI currently has no customers subscribing to this service. Therefore, it is no longer practical for SBC ASI to continue to market and offer this service.

Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71(b)(3)):

SBC ASI has no customers that subscribe to this service. However, out of an abundance of caution, SBC ASI notified the Los Angeles and San Francisco communities of its intention to discontinue NAP service by placing a classified advertisement in the

Los Angeles Times and San Francisco Chronicle on April 6, 2005. A copy of the notices are attached to this Application.

Copies of this Application are being sent, first class U.S. Mail, to the public utilities commission and governor of each state in which discontinuance is proposed and also to the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):

SBC ASI asserts that it is a non-dominant provider of advanced telecommunications services. SBC ASI has requested the FCC to confirm this regulatory classification.¹ However, out of an abundance of caution, SBC ASI is following the process for dominant carriers for this particular filing. The filing of this application does not in any way imply that SBC ASI consents to dominant carrier regulation.

Questions about this application may be addressed to Jan Price, SBC Services, Inc., Associate Director, Federal Regulatory, 1401 I Street N.W., Suite 400, Washington, D.C. 20005, (202) 326-8837, (202) 789-5319 (facsimile).

¹ See *Review of Regulatory Requirements for Incumbent LEC Broadband Telecommunications Services*, CC Docket No. 01-337, NPRM, 16 FCC Rcd 22745 (2001)(Title II NPRM); See also *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities; Universal Service Obligations for Broadband Providers; and Computer III Further Remand Proceedings; Bell Operating Company*

Conclusion:

The public convenience and necessity will not be adversely affected by the discontinuance of this service since there is no longer a demand for this service. Therefore, SBC ASI respectfully requests that the Commission approve its Section 63.71 Application to discontinue the provision of NAP service.

Respectfully submitted,

SBC Advanced Solutions, Inc.

By: 

Terri L. Hoskins
Gary L. Phillips
Paul K Mancini

SBC Services, Inc.
1401 I Street, NW
Suite 400
Washington, DC 20005

(202) 326-8893 – Tel. No.
(202) 408-8763 – Fax. No.

Its Attorneys

May 24, 2005

CERTIFICATE OF SERVICE

I, Otis Robinson, do certify that I have this 24th day of May 2005 served a copy of the foregoing Section 63.71 Application of SBC Advanced Solutions, Inc. by U.S.

Mail postage prepaid to the following:

Secretary of Defense
Attn: Special Asst. for Telecommunications
Pentagon
Washington, D.C. 20301

Michael R. Peevey
President, California Public Utilities Commission
Headquarters Office
505 Van Ness Avenue
San Francisco, CA 94102

Governor Arnold Schwarzenegger
State Capitol Building
Sacramento, CA 95814
Phone: 916-445-2841
Fax: 916-445-4633



Otis Robinson

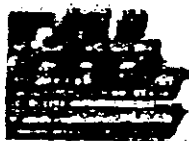
ATTACHMENTS

HOTELS

IVE B&B 15 U
a Drive 1st
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hotel. Exc loc
\$5,500,000
\$31,423,1172
Hilton \$4,7M
Hotel Brkg:
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scented products to the
meeting.

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PUBLIC NOTICES (NON-GOV.)

**PUBLIC NOTIFICATION
FOR DISCONTINUANCE OF
NETWORK ACCESS POINT
SERVICE (NAP) SBC Ad-
vanced Solutions, Inc.**
hereby provides public
notification of its plan to
discontinue NAP, an ad-
vanced telecommunications
service that allows
ISPs to interconnect and
exchange Internet traffic
amongst themselves,
commonly known as
'peering.' Subject to ap-
proval of its application
to discontinue NAP by
the FCC, SBC Advanced
Solutions, Inc. will re-
move NAP from service
in the San Francisco and
Los Angeles area on June
1, 2005.

Let people know who you are!
Add your company logo
to your ad!
San Francisco Chronicle

the public approval
requirements of 3
147(d) of the
Revenue Code of 1
amended.

All those Interes
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Project are invited
and be heard
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prior to the Publi
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McNamara, Mayo
fice of Housing
address indicated
Date: April 5, 2005

CITY AND COL

SAN FRA

Matthew O. J

Director, Mayor

of 1

04/05/2005

Your ad online can
Reach over
3.2 million SF Chronicle
San Francisco
SPCate...

SBC Operations-Regulatory
TOTO N. Saint Mary's Room 133C

San Antonio, TX 78215

Affidavit of Publication

—of—

Classified Advertising

State of California, }
County of Los Angeles } ss.

Margaret Thompson _____ of said
County and State being duly sworn, says:

That he is and at all times herein mentioned was a
citizen of the United States, over 21 years of age, and not
a party to nor interested in the above entitled matter; that
he is a principal clerk of the printers and publishers of the
LOS ANGELES TIMES a newspaper printed and
published daily in the said Los Angeles County; that the

Legal Notice

in the above entitled matter of which the annexed is a
printed copy, was published in said newspaper

LOS ANGELES TIMES

202 West First St. Los Angeles, CA. 90012

on the following days, to-wit:

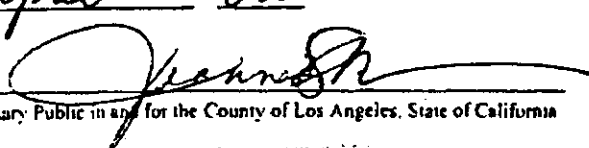
April 6, 2005

PUBLIC NOTIFICATION FOR DISCONTINUANCE OF NETWORK ACCESS POINT SERVICE (NAP)

SBC Advanced Solutions, Inc. hereby provides public notification of its plan to discontinue NAP, an advanced telecommunications service that allows ISPs to interconnect and exchange Internet traffic amongst themselves, commonly known as "peering." Subject to approval of its application to discontinue NAP by the FCC, SBC Advanced Solutions, Inc. will remove NAP from service in the San Francisco and Los Angeles areas on June 1, 2005.

Subscribed and sworn to before

me, this 11th day of
April 2005


Notary Public in and for the County of Los Angeles, State of California